Applicants respectfully assert that Shimotsuji and Smith, alone or in combination, do not teach or suggest a data input form retrieving system, including character string extracting means for extracting a character string out of each of plural data input forms containing character strings, extracting conditions input means for inputting a condition of extracting a specific data input form out of the plural data input forms, and data input form extracting means for extracting the specific data input form by retrieving the character string extracted by the character string extracting means in accordance with the extracting condition inputted by the extracting condition input means, wherein a text file containing the character strings extracted from the data input form is made up when the character strings have been extracted from each of the plural data input forms, as recited in claim 1, and similarly recited in claim 5 for a data input form retrieving method, and in claim 9 for a computer-readable recording medium.

In addition, Shimotsuji and Smith, individually and together, fail to teach or suggest a data input form retrieving system, including keyword adding means for adding a keyword to each of plural data input forms, extracting condition input means for inputting a condition of extracting a specific data input form out of the plural data input forms, and data input form extracting means for extracting the specific data input form by retrieving the keyword added by the keyword adding means in accordance with the extracting condition inputted by the extracting condition input means, wherein a text file containing the keywords extracted from the data input form is made up when the keywords have been extracted from each of the plural data input forms, as recited in claim 4, and similarly recited in claim 8 for a data input form retrieving method, and in claim 12 for a computer-readable recording medium.

Instead, Shimotsuji discloses techniques for document registration and retrieval based on input of image data for a new document. In particular, Shimotsuji teaches extracting line data in step S15 and characters in step S21 based on formats from step S2 in which form data

-2-

registered in the file memory are displayed and the user selects one form with which to observe the document (col. 3, lines 40-50, col. 4, lines 21-34 and Figs. 3 and 6 of Shimotsuji). However, Shimotsuji lacks any teaching or suggestion for inputting a condition employed to extract a specific data input form from the plural data input forms available.

Smith discloses a data entry system for an internet browser. In particular, Smith teaches passing a document to a data entry state 74 after being presented to a new browser window for enabling data to be entered (col. 5, lines 42-64 and Fig. 4 of Smith).

There is no motivation to combine features related to the data line extraction of Shimotsuji with the data entry technique of Smith, nor has the Office Action established sufficient motivation for a *prima facie* case of obviousness. Even assuming that motivation to combine the applied references could be established, the combination fails to teach or suggest Applicants' claimed features, as discussed above.

Applicants assert that the Examiner's allegation that it would have been obvious to one of ordinary skill in the art to implement replacing input tags for text fields is merely a conclusory statement, and that no support for such a statement has been provided. When relying on what is asserted to be general knowledge to negate patentability, that knowledge must be articulated and placed on the record. Providing only conclusory statements when dealing with particular combinations of prior art in specific claims cannot support an assertion of obviousness. *In re Lee*, 61 USPQ 2d 1430, 1434-35 (Fed. Cir. 2002).

A *prima facie* case of obviousness for a §103 rejection requires satisfaction of three basic criteria: there must be some suggestion or motivation either in the references or knowledge generally available to modify the references or combine reference teachings, a reasonable expectation of success, and the references must teach or suggest all the claim limitations (MPEP §706.02(j)). Applicants assert that the Office Action fails to satisfy these requirements with respect to the asserted combination of Shimotsuji and Smith.